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## BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION  
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IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S  
COMPLIANCE WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-0238

ERRATA TO AT&T'S RESPONSE  
TO STAFF'S MOTION TO MODIFY  
PROCEDURAL ORDER OF  
JANUARY 15, 2002

AT&T Communications of the Mountain States, Inc. and TCG Phoenix  
(collectively "AT&T") hereby file the attached errata to AT&T's Response to Staff's  
Motion to Modify Procedural Order of January 15, 2002.

AT&T has determined that a word was omitted from its Response that materially  
changes the meaning of the Response. AT&T is filing this errata to properly reflect the  
wording of footnote 8 on page 6. The word "not" has been inserted before the word  
"hypothetical." A replacement page 6 is attached to this pleading.

Arizona Corporation Commission

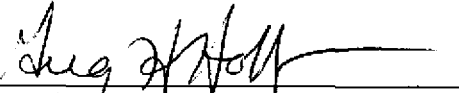
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Respectfully submitted this 15th day of February, 2002.

**AT&T COMMUNICATIONS  
OF THE MOUNTAIN STATES, INC.  
AND TCG PHOENIX**

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To conclude, 10 calendar days does not provide parties sufficient time to review the Final Report and Staff Report, new test documentation and prepare and file comments. AT&T requests that the parties be given 21 calendar days to file their comments.

**B. Additional SATE Testing**

On December 21, 2001, Hewlett-Packard ("HP") released its report on Qwest's stand-alone test environment ("SATE"). AT&T raised a number of issues with HP's Report. Generally, AT&T believes SATE has not been proven to be adequate.

HP made a number of recommendations in its report. Many of HP's recommendations were a result of the liability of HP to thoroughly test SATE because Staff placed a requirement on HP to release its Final Report no later than December 21, 2001. Because HP was unable to review a major release of SATE, HP recommended that a third party review the release of SATE 9.0, the next major release of SATE.

Unbeknownst to AT&T, Staff recently advised HP to review release 9.0 in accordance with its recommendation. Since Staff obtained no input from the TAG, AT&T is unclear how HP intends to perform the test on release 9.0.<sup>8</sup> Furthermore, AT&T does not know when HP will complete the review of release 9.0. Because AT&T does not know the extent of testing it cannot say what the extent of its comments will be.<sup>9</sup>

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<sup>8</sup> This is of considerable concern to AT&T, as the scope of the testing is every bit as important as the decision to retest release 9.0. An inadequate test will result in issues regarding the adequacy of the test being raised after the test is complete. AT&T's fears are not hypothetical, based on conversations between Qwest and HP that AT&T has only been able to listen in on.

<sup>9</sup> AT&T would oppose setting any date for release of HP's Report on release 9.0. Setting artificial test deadlines has caused numerous problems in the past.

## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **Errata to AT&T's Response to Staff's Motion to Modify Procedural Order of January 15, 2002**, Docket No. T-00000A-97-0238 were sent by overnight delivery on February 15, 2002 to:

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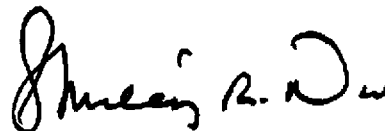
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Executed on February 15, 2002 in San Francisco, California.



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